

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Randy L. Tigar	:	Chapter 7
Debtor	:	
	:	Case no 23-10896-pmm
	:	
Fulton Bank N.A., Successor		
By Merger to Skylands		
Community Bank	:	
Movant	:	
Vs.	:	
	:	
Randy L. Tigar	:	
And	:	
Terry P. Dershaw, Esquire	:	
Respondent	:	
	:	

ANSWER TO MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY

Respondent, Randy L. Tigar, by and through his undersigned counsel, Michael J. McCrystal, Esquire answer the Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Upon reasonable investigation, respondents can neither admit nor deny the truth or falsity of this averment. The same is deemed to be denied under the Federal Rules of Bankruptcy Procedure and strict proof thereof is demanded.
4. Upon reasonable investigation, respondents can neither admit nor deny the truth or falsity of this averment. The same is deemed to be denied under the Federal Rules of Bankruptcy Procedure and strict proof thereof is demanded.
5. Upon reasonable investigation, respondents can neither admit nor deny the truth or falsity of this averment. The same is deemed to be denied under the Federal Rules of Bankruptcy Procedure and strict proof thereof is demanded.
6. Upon reasonable investigation, respondents can neither admit nor deny the truth or falsity of this averment. The same is deemed to be denied under the Federal Rules of Bankruptcy Procedure and strict proof thereof is demanded.

7. Denied, this averment is strictly denied and it is averred to the contrary. To the extent further answer is required, the exhibits which movant attached to its 362 Motion speak for themselves.
8. Denied this averment is strictly denied and it is averred to the contrary. By way of further answer, the debtor tendered funds to the mortgage company during August 2023..
9. Denied this averment is strictly denied and it is averred to the contrary.
10. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure. To the extent an answer is deemed to be required, the same is strictly denied and it is averred to the contrary.
11. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure. To the extent an answer is deemed to be required, the same is strictly denied and it is averred to the contrary.
12. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure. To the extent an answer is deemed to be required, the same is strictly denied and it is averred to the contrary.
- 13 . Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure. To the extent an answer is deemed to be required, the same is strictly denied and it is averred to the contrary.
14. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure. To the extent an answer is deemed to be required, the same is strictly denied and it is averred to the contrary.
15. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure. To the extent an answer is deemed to be required, the same is strictly denied and it is averred to the contrary.
16. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure. To the extent an answer is deemed to be required, the same is strictly denied and it is averred to the contrary.

WHEREFORE, Debtor prays this Honorable Court to deny the relief requested and for such other and further relief as this Court will deem just and equitable.

Respectfully submitted,

/s/ Michael J. McCrystal

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